UNITED STATES BANKRUPTY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:

Scungio Borst and Associates LLC., Debtor

Stephen J. Scherf, SBA Plan Trust Administrator of SBA Plan Trust.

Plaintiff

VS.

Schaibles Mechanical, LLC Defendant

Case No. 22-10609-amc Chapter 11

Adversary No. 24-00033-amc

NOTICE OF MOTION TO APPEAR PRO HAC VICE

TO: EDMOND M. GEORGE
Attorney for Plaintiff
Obermayer Rebmann Maxwell & Hippel, LLC
Centre Square West
1500 Market Street, Suite 3400
Philadelphia, PA 19102

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion we will move this Court pursuant to the Local Rules of the United States Bankruptcy Court for the Eastern District Of Pennsylvania for an Order allowing the admission of Donna L. Thompson, Esq., a member in good standing of the Bar(s) of the States(s) of New York and New Jersey, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for Defendant, Schaibles Mechanical LLC.

Request is made that the Court decide this Motion without hearing pursuant to Local Rule 9014-2 (7).

Dated: April 28, 2024

/s/ Kenneth Goodkind, Esq.

Kenneth Goodkind, Esq. 1650 Oakwood Drive, Unit E-116 Penn Valley, PA 19072 (609) 707-9288 KGESQS@yahoo.com